

Date: Dec 18, 2020 at 1:25 PM

From: mscottw <mscottw@masonlive.gmu.edu>

To: Matt Hardin <matthewdhardin@gmail.com> , Matthew D. Hardin  
<MatthewDHardin@protonmail.com>

Subject: Requests for Production



Mr. Hardin, Esq.,

I previously sent you copies of the Request for Production that I sent to your client. It is my position that these were properly served according to Rule 5(b)(2)(C) at Mr. Moon's business address which is posted publicly. It is also my position that the Summons will not be invalidated despite lacking the court name because the 4th district has ruled that "[w]hen there is *actual notice* , every technical violation of the rule or failure of strict compliance may *not invalidate* the service of process" (emphasis added) ( *Wade v. ALAMANCE COUNTY DEPARTMENT OF SOCIAL SERVICES, Dist. Court, MD North Carolina 2020* citing *Armco, Inc. v. Penrod-Stauffer Bldg. Sys., Inc.*, 733 F.2d 1087, 1089 (4th Cir. 1984) ) "

I'm not saying all that to invoke a legal discussion. It is with that position that I am asking you, before I file a revised Motion to Compel, if you would like to confer regarding the Request for Production that I sent to your client Mr. Moon.

Thank you,

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